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**Via ECF**

Hon. Lorretta A. Preska  
U.S. District Court for the Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: **Giuffre v. Dershowitz, No. 19-cv-3377-LAP**

Dear Judge Preska:

We represent non-party Sharon Churcher in connection with the Subpoena served on her by Defendant Alan Dershowitz. In our letter of November 23, 2020 (ECF No. 212), we requested that the Court hold our request for a pre-motion conference for a motion to quash in abeyance while we conferred with the parties to determine whether the issues in the potential motion could be narrowed or resolved. Since then, we have been actively conferring in good faith with the parties, and have made significant progress in narrowing the issues, but have not yet resolved all issues. Accordingly, we respectfully request that the Court continue to hold our request for a pre-motion conference in abeyance for an additional thirty (30) days (through January 7, 2020), to allow the parties to continue to confer. In the event the issues are resolved or it becomes clear that a motion will still be necessary before that date, we will promptly inform the Court.

Respectfully Submitted,

Davis Wright Tremaine LLP

/s/ Laura R. Handman

cc: All parties (via CM/ECF)